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October 2, 2023

Via ECF

The Honorable Judith C. McCarthy  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**MEMO ENDORSED**

APPLICATION GRANTED

  
Hon. Victoria Reznik, U.S.M.J.

Dated: 10/2/2023

**Re: United States v. Justine Ying**  
**Case No.: 7:22-mj-03841-UA-4**

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order of the Court permitting her to take on new employment that requires her to travel outside the confines of the Southern District of Florida. Ms. Ying has been offered an opportunity to work with Ray Cargo Corporation in the operation of a commercial motor vehicle and to make deliveries and pickups, some of which are outside of the district.

The undersigned has spoken to United States Attorney Steven Kochevar, who has indicated that the government does not object to the requested modification. The undersigned has spoken to United States Pretrial Services Officers Bernisa Mejia from the Southern District of Florida who indicates that Ms. Ying remains in compliance with her release conditions and with Cynthia Diaco, Supervisory Pretrial Services Officer from NYSD, who indicates that she has no objection to the requested modification.

WHEREFORE, the defendant moves that the Court issue an order modifying her conditions of release and permitting the defendant to travel as a requirement of her employment opportunity with Ray Cargo Corporation, subject to the conditions imposed by her probation officer.

RESPECTFULLY SUBMITTED,

THE DEFENDANT,  
JUSTINE YING

Respectfully submitted,

/s/ *Bruce D. Koffsky*